

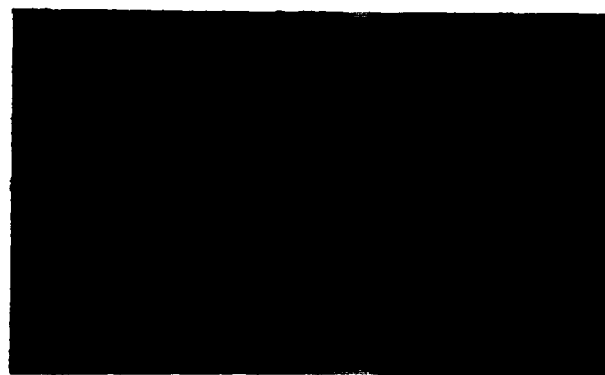
**EBASCO**

# **REM III PROGRAM**

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37367

**REMEDIAL PLANNING ACTIVITIES  
AT SELECTED UNCONTROLLED  
HAZARDOUS SUBSTANCE DISPOSAL SITES  
WITHIN EPA REGIONS I-IV**



**EPA CONTRACT 68-01-7250  
EBASCO SERVICES INCORPORATED**

ASB 002 0644

EPA WORK ASSIGNMENT NUMBER: 10-26A2.0  
EPA CONTRACT NUMBER: 68-01-7250

EBASCO SERVICES INCORPORATED

FINAL  
WORK PLAN  
RI/FS OVERSIGHT  
ASBESTOS DUMP  
MILLINGTON, NEW JERSEY

May 22, 1986

NOTICE

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ASB 002 0645

**EBASCO SERVICES INCORPORATED**

**EBASCO**

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May 22, 1986  
RMOII-86-18

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New York, NY 10278

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SUBJECT: WORK PLAN FOR ASBESTOS DUMP SITE  
MILLINGTON, NEW JERSEY  
WORK ASSIGNMENT NUMBER: 10-26A2.0  
EPA CONTRACT NUMBER: 68-01-7250

Dear Mr. Alvi and Mr. Robinson:

The REM III Team is pleased to present this Work Plan for your review and approval. This plan was developed from our initial review of some of the available information on the subject site and Fred C. Hart Associates' (consultant to National Gypsum Company) project plans. We have determined that no conflict of interest exists for the Regional Manager or the Site Manager, nor is there an organizational conflict of interest for the team members participating in this assignment.

Should you have any questions or comments regarding this submittal, please call me at (201) 460-6434 or Bill Colvin at (201) 460-6509.

Please sign and return a copy of this letter to me at the Lyndhurst, New Jersey address, indicating the date of receipt of the enclosed.

Very truly yours,

*Dev R. Sachdev*

Dev R Sachdev, Ph.D, P.E  
Regional Manager,  
Region II

ASB 002 0646

EPA WORK ASSIGNMENT NUMBER: 10-26A2.0  
EPA CONTRACT NUMBER: 68-01-7250

**EBASCO SERVICES INCORPORATED**

**FINAL WORK PLAN  
RI/FS OVERSIGHT  
ASBESTOS DUMP  
MILLINGTON, NEW JERSEY**

**May 22, 1986**

**Prepared By:**

William R. Colvin  
William R. Colvin  
Site Manager  
Ebasco Services Incorporated

**Approved by:**

Dev R. Sachdev  
Dev R Sachdev, Ph.D, P.E.  
Regional Manager, EPA Region II  
Ebasco Services Incorporated

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## EXECUTIVE SUMMARY

This Work Plan has been prepared by Ebasco Services, Inc. (Ebasco) in response to Work Assignment Number 10-26A2.0, issued under EPA Contract Number 68-01-7250. Ebasco will provide enforcement support to the EPA for the Asbestos Dump Site Remedial Investigation/Feasibility Study (RI/FS) activities. These activities will be conducted by Fred C. Hart Associates as a consultant for National Gypsum Company. The RI/FS activities are being undertaken in accordance with the requirements of an Administrative Order issued by the EPA (Index Number: II-CERCLA-50103).

Ebasco proposes the following three tasks and subtasks to provide the enforcement support:

### Task 1 - Project Plan Review and Preparation of Plans

- o Review of the Administrative Order and other technical documents.
- o Prepare an Enforcement Oversight Work Plan, Health and Safety Plan, and Field Sampling and Analysis Plan.
- o Meet with EPA prior to beginning Task 2.

### Task 2 - Field Activity Oversight

- o Provide field oversight support for all activities conducted by Fred C. Hart Associates, except the Site Reconnaissance, the Topographic and Boundary Survey, and the Survey of Sampling Locations.
- o Receive split samples from Fred C. Hart Associates and ship samples for CLP analyses.
- o Maintain a field logbook and prepare daily and weekly reports during oversight activities.
- o Compare the CLP analytical data with the analyses conducted by Fred C. Hart Associates.

### Task 3 - Review of Draft RI and FS Reports

- o Prepare letter reports summarizing Ebasco's comments on Fred C. Hart Associates' Draft and Final RI and FS Reports.
- o Meet with EPA at the conclusion of Task 3.

The estimated cost for the oversight support for the Asbestos Dump Site is \$95,154; the estimated level of effort is 1,197 hours.



## 1.0 INTRODUCTION

This Work Plan has been prepared by Ebasco Services, Inc. (Ebasco) in response to Work Assignment Number 10-26A2.0, issued under EPA Contract Number 68-01-7250. Ebasco will provide enforcement support to the EPA for the Asbestos Dump Site Remedial Investigation/Feasibility Study (RI/FS) activities. These activities will be conducted by Fred C. Hart Associates, New York, NY, as a consultant for National Gypsum Company. The RI/FS activities are being undertaken in accordance with the requirements of an Administrative Order on Consent entered into by the EPA and National Gypsum Company; Index Number II-CERCLA-50103 (Reference 1). This document provides a scope of work, a schedule of deliverables, an estimate of labor hours, and a proposed budget to perform the tasks necessary to fully satisfy EPA requirements for oversight of Fred C. Hart Associates' activities during the site investigation.

### 1.1 OBJECTIVES

The objective of this project is to provide enforcement support to the EPA for the RI/FS activities to be conducted by Fred C. Hart Associates as a consultant for National Gypsum Company. This will be accomplished by conducting reviews of project plans prepared by Fred C. Hart Associates, overseeing of field activities during site investigations, and reviewing the RI and FS Reports prepared by Fred C. Hart Associates.

### 1.2 BACKGROUND

The Asbestos Dump Site is comprised of four separate locations in Morris County New Jersey:

- o Millington Site, located near Haas and Maple Roads near the town of Millington
- o Great Swamp Site, located in Harding Township along Great Brook near Long Hill Road (approximately 9 miles northwest of the Millington Site).
- o 257 New Vernon Road Site, located in Passaic Township on New Vernon Road near Meyersville (approximately 7 miles north - northeast of the Millington Site).
- o White Bridge Road Site, located in Passaic Township at the intersection of White Bridge Road and New Vernon Road (approximately 1 mile north of the 257 New Vernon Road Site).

Between 1953 and 1978, National Gypsum Company owned and operated

an asbestos cement siding sheets and shingles manufacturing plant in Millington, New Jersey. To help process its waste streams, the company utilized at least three surface lagoons at the Millington property. This property is also the site of a waste pile containing asbestos, which extends for a distance of approximately 450 feet along the Passaic River at the western end of the property. There is a threat that asbestos fibers may enter the Passaic River, a potable water supply, due to the erosion of cover material on the asbestos pile (Reference 1). Mercury contamination may also exist in the waste materials since National Gypsum used phenylmercuric acetate as a coating material, from 1959 through 1972 at the Millington plant.

Asbestos-containing wastes generated by the company while operating at the Millington Site were disposed of at the Great Swamp, 257 New Vernon Road Site, and White Bridge Road Site. The Great Swamp Site, also known as the Dietzman Tract of the Great Swamp National Wildlife Refuge, is accessible to the public and is used by hikers and other visitors. The 257 New Vernon Road Site and White Bridge Road Site are individual residences (Reference 1).

In April 1985, the US Environmental Protection Agency (EPA) and National Gypsum entered into an Administrative Order on Consent, whereby National Gypsum agreed to perform a Remedial Investigation and Feasibility Study (RI/FS) at the Millington property in addition to the other three sites.

### 1.3 PROPOSED RI/FS SCOPE OF WORK (FRED C. HART ASSOCIATES)

Fred C. Hart Associates will conduct RI/FS activities at the Asbestos Dump Site as a consultant for the National Gypsum Company. Field activities proposed by Fred C. Hart Associates (Reference 3) include:

- o Surface water sediment, and benthic sampling and analyses. In addition, flagging of asbestos disposal areas at all four sites will also be conducted during Task 2.
- o A site survey (Task 4) to develop plot plans and topographic maps for all four sites. A title search, and property line survey will be conducted. Old monuments will be located and new ones constructed to establish horizontal and vertical control.
- o Monitoring well installation (Task 8) at each of the four sites. Falling- or rising-head permeability tests on selected wells will also be performed in addition to obtaining water level readings.

- o Collecting subsurface soil, surface soil, surface water, sediment, groundwater, air, and asbestos waste samples for chemical analyses. This task (Task 10) will include collecting a total of three rounds of surface water and groundwater samples for chemical analysis. A potable water survey will also be conducted in which potable well samples will be collected from home owners in the vicinity of the White Bridge Road Site and 257 New Vernon Road Site. Some of the surface and subsurface soils will also be analyzed for engineering properties.

Upon completion of the field investigations, laboratory analyses, and data review, Fred C. Hart Associates will prepare a draft Remedial Investigation (RI) report summarizing all data and characterizing site contamination.

Fred C. Hart Associates will conduct a Feasibility Study (FS) following the RI to develop and evaluate remedial alternatives for the site.

#### 1.4 REFERENCES

1. EPA Work Assignment Number 10-26A2.0 dated, March 20, 1986.
2. Discussions with Mr. Nigel Robinson, EPA Remedial Project Manager, on March 21, 1986, April 10, 1986, May 13, 1986 and May 19, 1986. Subject: Enforcement Oversight requirements and work assignment task descriptions.
3. Fred C. Hart Associates, November 1985. Work/Quality Assurance Project Plan. Remedial Investigation (Millington, Great Swamp, White Bridge Road, and 257 New Vernon Road Sites).
4. Fred C. Hart Associates, November 1985. Work/Quality Assurance Project Plan. Remedial Investigation (Millington, Great Swamp, White Bridge Road, and 257 New Vernon Road Sites).

## **2.0 SCOPE OF WORK (EBASCO)**

The Ebasco scope of work includes the following three (3) tasks and associated subtasks.

### **Task 1 - Project Plan Review and Preparation of Plans**

- o Preparation of a Work Plan for EPA's review and approval.
- o Review of Fred C. Hart Associates' project plans, including the Quality Assurance (QA) Plan, Health & Safety Plan, and Site Operations Plan.
- o Preparation of a Field Sampling and Analysis Plan (including necessary quality assurance requirements) and a Health & Safety Plan for Ebasco's site activities.

### **Task 2 - Field Oversight Activity**

- o Performance of field investigation oversight and confirmatory sampling and analysis activities.
- o Preparation of daily field audit reports, weekly letter reports and a summary report for the field investigation oversight activities.

### **Task 3 - Review of Draft RI and FS Reports**

A description of each task follows.

#### **2.1 TASK 1 - PROJECT PLAN REVIEW AND PREPARATION OF PLANS**

This task includes the preparation of the project plans required for the performance and management of oversight activities and the review of Fred C. Hart Associates' project plans.

##### **2.1.1 Work Plan Preparation**

The objective of the Work Plan is to present the scope, schedule, and estimated budget to perform the tasks outlined in the Work Assignment.

##### **2.1.2 Review of Fred C. Hart Associates' Project Plans**

A technical review of the Fred C Hart Associates' project plans will be conducted to:

- o Prepare Ebasco's Work Plan, Health and Safety Plan and Field Sampling and Analysis Plan; and

- o Familiarize field personnel with the sampling and remedial activities to be performed by Fred C. Hart Associates

For cost estimating purposes, one meeting between Ebasco, EPA Region II, and Fred C. Hart Associates has been planned as part of this task. The purpose of this meeting will be to review the final project plan requirements and to outline project coordination between EPA, Ebasco, and Fred C. Hart Associates, including field logistics and schedule.

#### 2.1.3 Health and Safety and Field Sampling and Analysis Plan (FSAP) Preparation

A Health and Safety Plan (HASP) for field activities will be prepared to provide adequate Health and Safety protection for field personnel in accordance with the REM III Program Health and Safety Plan and EPA requirements. The HASP is required for any site activity, including reconnaissance, oversight of Fred C. Hart Associates' RI work, and the handling of split samples. The HASP will be updated prior to each site activity, if required by changed site conditions.

A Field Sampling and Analysis Plan will also be prepared describing Ebasco field activities. This plan will include Quality Assurance (QA) protocols for split sampling, sample preservation, shipment, and sample analyses.

A Work/QA Plan Short Form pursuant to the EPA document, "Guidance for Preparation of Combined Work/Quality Assurance Project Plans for Water Monitoring," May 26, 1983 (The Brossman Guidance) will be prepared. This will be submitted to EPA at least four weeks prior to commencement of field activities.

#### 2.2 TASK 2 - FIELD OVERSIGHT ACTIVITY

Field oversight of Fred C. Hart Associates and their subcontractors during sampling and monitoring well installation activities will be performed. EPA Contract laboratory analyses will be initiated, if applicable, for designated groundwater, soil, sediment, surface water, and waste samples split with Fred C. Hart Associates.

The site investigation activities will be monitored for adherence to the Administrative Order and the EPA-approved project plans. Field activities, included in Tasks 2, 4, 8, 9 and 10 in Fred C. Hart Associates' Draft Site Operations Plan, include:

- o Initial surface water, sediment, and benthic sampling. Flagging of asbestos disposal areas will also be conducted in Task 2 (one week, estimated).

- o Site Survey conducted in Task 4 (five weeks, estimated).
- o Monitoring well installation and surveying, Tasks 8 and 9 respectively, (ten weeks, estimated).
- o Collection of groundwater, soil, sediment, surface water, and waste samples, Task 10 (twelve weeks over a 21 week period, estimated).

Ebasco will have one person on site every day during the twelve weeks of sample collection. This person will also oversee seven of the nine weeks of well installation during the sampling effort. As requested by EPA, Ebasco will not oversee the surveying efforts, aquifer tests, sampling of benthic organisms, flagging of asbestos disposal areas, or the door to door survey of home owner's wells.

Split samples will be prepared and shipped to CLP laboratories for analysis. It is assumed that Fred C. Hart Associates will collect all samples and supply Ebasco with the split samples. Ebasco protocols for split sample handling will be outlined in Ebasco's Field Sampling and Analysis Plan. Ten percent of the proposed samples, as estimated in the Fred C. Hart Associates' Draft Site Operations Plan, will be split for CLP analyses. A summary of the proposed split sampling frequency is included in Table 2-1.

Ebasco will prepare daily reports on a field audit report form. Additional information will be placed in a controlled project logbook. The logbook will contain, at a minimum, the following information:

- o Date and time of site visit.
- o Climate conditions.
- o Names of Ebasco and Fred C. Hart Associates (including Subcontractors) personnel on site.
- o Description of site activities, noting any changes in scope or nonconformance with EPA-approved project plans of the Administrative Order.

Weekly letter reports during oversight activities will be submitted to EPA. A letter report summarizing these activities will be submitted to EPA three weeks after the conclusion of the field sampling activities.

**TABLE 2-1**  
**ASBESTOS DUMP SITE ENFORCEMENT SUPPORT**  
**PROPOSED SPLIT SAMPLING PROGRAM**

<u>Sample Type</u>	<u>Samples Proposed to be Collected<sup>a</sup></u>	<u>Samples Proposed to Be Split</u>
Ambient Air	36	0
Surface Water	51	6
Sediment	33	4
Groundwater	80	9 <sup>c</sup>
Subsurface Soil and Waste	72 <sup>b</sup>	5

<sup>a</sup> Based on Table 2-2, page 2-19, Draft Site Operations Plan prepared by Fred C. Hart Associates.

<sup>b</sup> Includes 24 analyses for engineering properties.

<sup>c</sup> Groundwater samples consist of two categories with different sampling schedules: groundwater monitoring samples (6 splits); and potable well samples (3 splits).

Ebasco also proposes to compare the CLP analytical data for the split samples with the sample analyses conducted by Fred C. Hart Associates. This should be done as soon as the validated data are available, and before Fred C. Hart Associates produces the draft RI report, to ensure that there are no major inconsistencies between the sample sets which might invalidate the RI conclusions. Ebasco views this activity as an essential element in the oversight of the RI. In order to perform this activity, Ebasco will need to obtain, with assistance from EPA, the Fred C. Hart Associates analytical results in a timely manner. A letter report will be prepared on the sample comparison effort and submitted to EPA three weeks after receipt of all of the validated analytical data. It is proposed that one meeting be held at the conclusion of this task to present any significant findings and to discuss the contents of the summary report.

### 2.3 TASK 3 - REVIEW OF DRAFT RI AND FS REPORTS

Ebasco will conduct a detailed technical review of the draft RI and draft FS reports. These reports will be evaluated for completeness and adherence to the requirements and guidance contained in the following documents:

- o Administrative Order Number II-CERCLA-50103.
- o The National Contingency Plan, 50FR224, November 22, 1985.
- o EPA's "Guidance on Feasibility Studies Under CERCLA," June, 1985.
- o EPA's "Guidance on Remedial Investigations under CERCLA", June 1985.

An evaluation matrix will be provided as part of the letter report summarizing the extent to which the NCP criteria are met by the draft RI and FS reports. The approaches used by Fred C. Hart Associates in assessing risks to human health and the environment will be reviewed for their conformance with the draft Superfund Public Health Evaluation Manual (Dec. 1985). Comments will be summarized in a letter to EPA for each report. After receipt and review of Ebasco's comments it is proposed that a meeting be held to discuss the comments.

### 2.4 POTENTIAL COMMUNITY RELATIONS ACTIVITIES

Although the RI/FS will be conducted by the responsible party and its contractors, EPA retains responsibility for all community relations activities conducted for the Asbestos Dump Site. The REM III team will support EPA Region II in conducting these activities, as requested by EPA. Such activities may include:



- o Revising the existing Community Relations Plan for the site;
- o Establishing one or more information repositories in the community;
- o Preparing fact sheets for distribution to area residents and officials;
- o Sending and preparing written summaries of possible meetings;
- o Maintaining and updating a mailing list for the site; and
- o Preparing a responsiveness summary for inclusion in the Enforcement Decision Document.

Community relations activities were not included as a separate item in the scope of work for the Asbestos Dump Site and the cost for such activities is not included in the budget. Should EPA request support for community relations activities, Ebasco will provide a separate scope of services and budget for those activities.

### 3.0 MANAGEMENT APPROACH

#### 3.1 PROJECT ORGANIZATION

Ebasco will provide enforcement support to the EPA for the Asbestos Dump Site RI/FS activities. The project will be performed under the direction of Ebasco Regional Manager, Region II, Dr. Dev R. Sachdev. The Site Manager will be Mr. William R. Colvin of Ebasco. Technical staff for field activity oversight and for review of plans and reports will be supplied by Ebasco.

#### 3.2 SCHEDULE

The schedule for Ebasco oversight activities (Table 3-1) is based on the 12 week sampling schedule (conducted over a period of 21 weeks) as estimated in the RI/FS schedule prepared by Fred C. Hart Associates'. Milestone dates for oversight task startup and completion cannot be determined until final schedule and startup dates are approved by the EPA.

#### 3.3 COST ESTIMATE

The cost estimate for this scope of work is based on the following assumptions:

- o Technical review will include only the first draft of each of Fred C. Hart Associates' deliverables.
- o The schedule and duration of sampling and well installation activities will not exceed what is shown in the draft Site Operations Plan prepared by Fred C. Hart Associates.
- o The number of split samples, Table 3-2, for CLP analyses will not exceed the estimate in Table 2-1 of this Work Plan.
- o Ebasco will not perform any sampling. Split samples will be provided to Ebasco by Fred C. Hart Associates.
- o Site activities will be conducted under level D personnel protection when work is being conducted outside the exclusion zone. Work conducted within the exclusion zone will be conducted under Level C protection. It is assumed that half the work will be conducted within the exclusion zone.
- o Four meetings will be held:
  - a pre-work plan meeting (held on March 21, 1986);

**TABLE 3-1  
SCHEDULE FOR RI/FS OVERSIGHT  
ASBESTOS DUMP SITE**

<u>Oversight Task</u>	<u>Start</u>	<u>Completion</u>
<b><u>TASK 1</u></b>		
o Preparation of Draft Work Plan	April 3, 1986	April 18, 1986
o Preparation of Final Work Plan	May 13, 1986	May 22, 1986
o Project Plan Review (Site Operations Plan, QA Plan, Health and Safety Plan)	EPA approval of Ebasco Work Plan	Three weeks after EPA approval of Ebasco Work Plan
o Preparation of Ebasco QA and Health and Safety Plans	Upon EPA approval of Ebasco Work Plan and Fred C. Hart Associates project plans	Three weeks after EPA approval of Ebasco Work Plan and Fred C. Hart Associates project plans
<b><u>TASK 2</u></b>		
o Site Investigation Oversight and Split Sampling	During site investigation	Upon completion of site investigation activities
o Summary Report	Upon completion of sampling and well installation	Three weeks after sampling activity is completed
o Comparison of Analytical Results	Upon receipt of validated CLP data for split samples and analytical results from Fred C. Hart Associates	Three weeks after receipt of data
<b><u>TASK 3</u></b>		
o RI Report Review	Upon receipt of draft RI report	Four weeks after receipt of draft RI report and validated CLP data
o FS Report Review	Upon receipt of draft FS report	Three weeks after receipt of draft FS report

**TABLE 3-2  
ASBESTOS DUMP SITE  
RI/FS OVERSIGHT**

**SCHEDULED FIELD ACTIVITIES  
AND EBASCO PROPOSED OVERSIGHT**

<u>Activity</u>	<u>Scheduled Activity Days<sup>a</sup></u>	<u>Proposed Oversight Days</u>
Site Reconnaissance	5	0
Topographic and Boundary Survey	25	0
Well Installation	45	35
Field Survey	5	0
Air Monitoring	25	25
Surface Water/Sediment Sampling	5	5
Subsurface Soil/Waste Sampling	25	25
Groundwater Sampling	15	15
Surface Water Monitoring	10	10
Potable Well Sampling	<u>5</u>	<u>5</u>
Total Activity Days	165	120
Total Days on Site <sup>b</sup>	85	60

- a. Duration of each activity which includes parallel and overlapping activities. Based on Draft Site Operations Plan prepared by Fred C. Hart Associates.
- b. Total duration on-site (total activity days less the days for parallel and overlapping activities).

- a pre-RI meeting (Task 1);
  - a post-RI field activities meeting (Task 2); and
  - a post-FS meeting (Task 3).
- o Fred C. Hart Associates will collect all samples for splitting with Ebasco. Ebasco will receive the split samples from Fred C. Hart Associates.
  - o No delay will occur in acquiring CLP-SAS services.

Modifications in the final EPA-approved Site Operations Plan prepared by Fred C. Hart Associates might require revision of the cost and labor estimates contained herein. Under separate cover detailed cost information is presented to PEA for this assignment. The estimated cost for this Work Assignment is \$95,154 and the estimated level of effort is 1,197 hours.